

May 31, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: PS Docket No. 12-74; Written *Ex Parte* Presentation

Dear Ms. Dortch:

On May 22, 2012 the Technical Advisory Board for First Responder Interoperability (“Interoperability Board”) submitted to the Federal Communications Commission its report on “Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide public Safety Broadband Network.”<sup>1</sup> The Interoperability Board’s mission under the Spectrum Act was to identify minimum technical requirements for interoperability that will guide the First Responder Network Authority in designing, constructing, and operating the nationwide public safety broadband system.<sup>2</sup>

The importance of the Interoperability Board’s work cannot be overstated. FirstNet is required to issue RFPs for building, operating and maintaining the nationwide network that use, without material change, the technical requirements developed by the Interoperability Board and as finalized by the Commission.<sup>3</sup> Thus, it was critical for the Interoperability Board to provide requirements that are clear and detailed enough to ensure consistent interoperability across the FirstNet system but that also provide sufficient flexibility for FirstNet to make its own strategic and technical determinations about system design, within the parameters to be set by the Commission.

Motorola Solutions believes that the Interoperability Board has accomplished this objective and supports its recommended technical requirements. In Motorola Solutions’ view, the Interoperability Board’s recommended requirements represent an effective interoperability framework for the nationwide system that appropriately builds upon the Commission’s existing orders and commercial standards. The Board’s recommendations also recognize that public safety communications requirements can differ from the consumer market and has therefore addressed ways to accommodate public safety features such as dynamic QOS control with preemption and regional application support.<sup>4</sup>

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<sup>1</sup> See Technical Advisory Board for First Responder Interoperability, Final Report: *Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network* (May 22, 2012) (“Interoperability Requirements”).

<sup>2</sup> See Middle Class Tax Relief and Job Creation Act of 2012 § 6203(b)(1)(A), Pub. L. No. 112-96, 126 Stat. 156 (2012) (“Spectrum Act”).

<sup>3</sup> *Id.* § 6206(b)(1)(B).

<sup>4</sup> See, e.g., Interoperability Requirements at 1.3.6, 4.1.10 and 4.7.

Equally important, the Interoperability Board's technical requirements give FirstNet the flexibility to incorporate existing infrastructure deployed pursuant to FCC-issued 700 MHz public safety broadband waivers. Consistent with the Spectrum Act's explicit direction that FirstNet utilize – to the maximum extent economically desirable – existing infrastructure in deploying the nationwide network, the Interoperability Board's recommendations allow FirstNet to determine how best to integrate these deployments with the nationwide system. For example, Section 4.1.4 of the requirements document provides interoperable reference architectures that contemplate the integration of waiver-deployed radio access network (“RAN”) and evolved packet core (“EPCs”) infrastructure elements, as well as the use of a common PLMN ID across the entire FirstNet system.<sup>5</sup> In this way, the Interoperability Board recommendations do not bind FirstNet to any specific network design, but they also would be consistent with the FCC extending the existing waivers and granting additional waivers where appropriate, as broadly supported by the public safety community on the record in PS Docket 12-94.<sup>6</sup>

The Commission should approve the recommendations submitted by the Interoperability Board.

Respectfully submitted,

/s/ Catherine W. Seidel

Catherine W. Seidel

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<sup>5</sup> *Id.* at 4.1.4.

<sup>6</sup> *See, e.g.*, Comments of City and County of San Francisco and the Bay Area Regional Interoperable Communications Systems Authority, PS Docket No. 12-94 (filed Apr. 20, 2012); Comments of City of Chesapeake, Virginia and Dallas/Fort Worth International Airport, PS Docket No. 12-94 (filed Apr. 20, 2012); Comments of LA-RICS, PS Docket No. 12-94 (filed Apr. 20, 2012); Comments of Nevada Department of Transportation, PS Docket No. 12-94 (filed Apr. 20, 2012); Comments of the Operators Advisory Committee to the Public Safety Spectrum Trust (“PSST-OAC”), PS Docket No. 12-94 (filed Apr. 20, 2012); Comments of State of New Mexico, PS Docket No. 12-94 (filed Apr. 20, 2012).